

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE: 1:24-cv-20547-CMA

CARLOS BRITO,

Plaintiff,

v.

CHOPIN, LLC, and THE FANCY
GOOSE GROUP LLC d/b/a LA
FRESA FRANCESCA,

Defendants.

_____ /

JOINT PROPOSED SCHEDULING ORDER

April 30, 2024	Selection of a mediator and scheduling of a time, date and place for mediation (30 days from deadline to submit Joint Scheduling Report)
April 15, 2024	Deadline to amend pleadings and join parties (60 days from deadline to submit Joint Scheduling Report)
July 19, 2024	Plaintiff shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
July 19, 2024	Defendants shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
August 16, 2024	The parties shall exchange rebuttal expert witnesses and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
August 30, 2024	Completion of all discovery
October 25, 2024	Completion of mediation
November 22, 2024	Deadline for dispositive pre-trial motions and <i>Daubert</i> motions (which include motions to strike experts)
December 20, 2024	Deadline for submission of joint pre-trial stipulation, proposed jury instructions and verdict form, or proposed findings of fact and conclusions of law, as applicable (two (2) weeks before the trial date).

February 3, 2025

Trial

Dated: March 19, 2024

By: /s/ Beverly Virues

BEVERLY VIRUES

Florida Bar No.: 123713

ARMANDO MEJIAS

Florida Bar No.: 1045152

GARCIA-MENOCAL & PEREZ, P.L.

350 Sevilla Avenue, Suite 200

Coral Gables, FL 33134

Telephone: (305) 553-3464

Facsimile: (305) 553-3031

Primary E-Mail: bvirues@lawgmp.com

Secondary E-Mails: amejias@lawgmp.com

jacosta@lawgmp.com

Counsel for Plaintiff

By: /s/ Alexander F. Fox

Alexander F. Fox

Florida Bar No. 167886

Alexander F. Fox, P.A.

Counsel For Defendants

1 Alhambra Plaza, Suite 1225

Coral Gables, Florida 33134

Tel: (305) 448-1033

alexfox@alexanderfoxlaw.com

By: s/ Eduardo F. Rodriguez

Eduardo F. Rodriguez

Florida Bar No. 036423

EFR LAW FIRM

Counsel for Defendants

800 S. Douglas Road, Suite 350

Coral Gables, Florida 33134

Office: (305) 340-0034

Mobile: (305) 978-9340

eddie@efrlawfirm.com